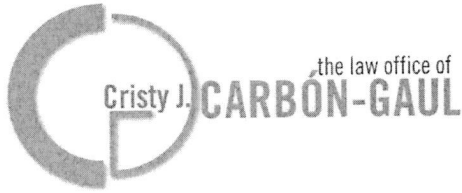


EXHIBIT

No. 1



505.899.5696 | cristy@carbon-gaul.com
10515 4th Street NW | Albuquerque, NM 87114 | carbon-gaul.com

October 21, 2019

VIA EMAIL mesquivel@esqlawnm.org
AND BY REGULAR MAIL

Martin Esquivel
Esquivel and Howington, LLC
111 Lomas Blvd. N.W., Suite 203
Albuquerque, NM 87102

RE: Shannon Szuszalski v. Rudy Fields, *et al.*; In the United States District Court for the District
of New Mexico; Case No. CV-19-250-RB/CG

Dear Mr. Esquivel:

Enclosed is the invoice pursuant to the Order issued on September 17, 2019 awarding Plaintiff mandatory expenses and attorney's fees related to Motion to Compel.

Additionally, we enclose a copy of the previous invoice. The JSR states you would pay this two weeks from the date the JSR was filed—that being September 26.

Please comply with the Court's orders by October 28, 2019.

Very truly yours,

Cristy J. Carbón-Gaul

CJC:jmb

Enclosure

Invoice

Invoice #: 3138
 Invoice Date: 10/14/2019
 Due Date: 10/14/2019

Bill To:

IMO Linda Baragiola

Date	Description	Hours/Qty	Rate	Amount
6/28/2019	Began drafting Motion to Compel-Factual Section and exhibits.	2.9	250.00	725.00T
6/28/2019	review previous correspondence to opposing counsel and review discovery requests and responses to confirm outstanding discovery; finished drafting	0.4	250.00	100.00T
6/28/2019	good faith letter to County's attorney regarding Fields's responses Draft June 28, 2019 Letter to Opp. Counsel regarding Court's order granting Motion to Compel and request for fees.	0.9	250.00	225.00T
7/4/2019	Research default judgment issue since County still hasn't provided initial disclosures.	1.6	250.00	400.00T
7/5/2019	Continue drafting 2nd motion to compel	3.4	250.00	850.00T
7/8/2019	Continue drafting of 2nd motion for sanctions and to compel	4.2	250.00	1,050.00T
7/8/2019	Draft letter to county regarding non-response to 6/28 Good Faith letter	0.2	250.00	50.00T
7/9/2019	Research Rule 37 sanctions as it relates to failure to respond after a court order and continued failure to respond to discovery.	2.6	250.00	650.00T
7/11/2019	Draft email to opposing counsel regarding accident reconstruction produce in County's initial disclosures	0.1	250.00	25.00T
7/17/2019	Review opposing counsels email regarding status of discovery responses	0.2	250.00	50.00T
7/22/2019	Draft email response to opposing counsel regarding discovery issues and his email from July 17, 2019	0.1	250.00	25.00T

Please mail payment to:
 The Law Office of Cristy J. Carbon-Gaul
 10515 4th St. NW
 Albuquerque, New Mexico 87114

cristy@carbon-gaul.com

Total**Payments/Credits****Balance Due**

Invoice

Invoice #: 3138
Invoice Date: 10/14/2019
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Bill To:

IMO Linda Baragiola

Date	Description	Hours/Qty	Rate	Amount
7/23/2019	Draft detailed email to opposing counsel regarding prior communications about discovery issues, 2nd motion to compel, and necessity of canceling the depositions	0.6	250.00	150.00T
7/25/2019	review and respond to opposing counsel's email regarding missing discovery.	0.2	250.00	50.00T
7/25/2019	Draft good faith letter regarding Fields's and County's discovery answers	1.9	250.00	475.00T
7/31/2019	Draft 3rd good faith letter to opposing counsel regarding discovery deficiencies	1.1	250.00	275.00T
8/1/2019	Draft email to opposing counsel regarding discovery issues, prepared exhibits to attach to email.	1.6	250.00	400.00T
8/2/2019	Draft 2nd Motion to Compel - revising fact section and begin preparation of exhibits	2.4	250.00	600.00T
8/5/2019	Finalizing fact section to date for motion to compel	1.1	250.00	275.00T
8/7/2019	Prepare discovery chart detailing what discovery is still missing	2.2	250.00	550.00T
8/7/2019	Draft 4th and Final good faith letter prior to filing 2nd motion to compel	1.7	250.00	425.00T
8/7/2019	Finish drafting of motion to compel	1.8	250.00	450.00T
8/8/2019	Finalize exhibits and 2nd motion to compel/ sanctions	3.7	250.00	925.00T
8/12/2019	draft letter regarding discovery, IPRA requests detailing the timeline of requests and correspondence with opposing counsel	2.5	250.00	625.00T
8/13/2019	prepare for and attend Discovery Status conference relating to 2nd motion to compel	0.7	250.00	175.00T

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Total**Payments/Credits****Balance Due**

Invoice**Invoice #:** 3138**Invoice Date:** 10/14/2019**Due Date:** 10/14/2019**Bill To:**

IMO Linda Baragiola

Date	Description	Hours/Qty	Rate	Amount
8/16/2019	Discovery meeting with opposing counsel to resolve remaining discovery issues	2	250.00	500.00T
8/19/2019	Draft letter to confirm and follow-up regarding meeting with opposing counsel on August 16, 2019	0.6	250.00	150.00T
8/22/2019	Review County's response to 2nd motion to compel	0.2	250.00	50.00T
9/2/2019	Begin drafting Reply brief on 2nd motion to compel	1.2	250.00	300.00T
9/4/2019	Finish drafting of reply brief regarding 2nd motion to compel	3.9	250.00	975.00T
9/5/2019	Draft JSR relating to discovery and 2nd motion to compel	0.4	250.00	100.00T
9/5/2019	Prepare exhibits and finalized reply regarding 2nd motion to compel	2.2	250.00	550.00T
9/6/2019	Attend telephonic conference with Court regarding JSR, Reply Brief and upcoming hearing	0.2	250.00	50.00T
9/12/2019	Draft amended JSR concerning outstanding discovery and 2nd motion to compel	1.5	250.00	375.00T
	Sales Tax		7.875%	990.28

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10515 4th St. NW
Albuquerque, New Mexico 87114

cristy@carbon-gaul.com

Total \$13,565.28

Payments/Credits \$0.00

Balance Due \$13,565.28